

Andy Williams

From: Andy Williams
Sent: Tuesday, December 16, 2008 1:17 PM
To: 'kknox@fec.net'
Cc: Roger Denton
Subject: Re: Davis v. UP

I can understand your position. I think it will be necessary to let the Court decide this matter

From: Kristopher Knox
To: Andy Williams
Sent: Tue Dec 16 13:13:56 2008
Subject: RE: Davis v. UP

Andy,

We will not encourage UP to take any action regarding the employee who took the photos, but we cannot agree to a protective order regarding discipline.

Kris

From: Andy Williams [mailto:AWilliams@uselaws.com]
Sent: Monday, December 15, 2008 11:34 AM
To: Kristopher Knox
Subject: Re: Davis v. UP

It was a current UP employee and I will disclose the name if UP will agree to a protective order regarding discipline of this employee regarding the taking of the photos. I am in trial and have limited ability to respond

From: Kristopher Knox
To: Andy Williams
Sent: Mon Dec 15 09:15:05 2008
Subject: RE: Davis v. UP

Andy,

I have not heard from you regarding the who took the pictures attached to Plaintiff's April 9, 2008 Supplemental Responses to Defendant's Request for Production. I need to know by today since the discovery cutoff is approaching.

Kris

From: Andy Williams [mailto:AWilliams@uselaws.com]
Sent: Friday, December 05, 2008 2:34 PM
To: Kristopher Knox

12/22/2008

Subject: Davis v. UP

Kris,

I am attempting to find out who exactly took the pictures. Client does not know. They may have been taken by someone from our office and I'm trying to find out who and whether a work product objection would be applicable. Can you give me to the 9th to figure this out?

Andy Williams
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12/22/2008